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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIKAELA MARIE CUEVAS,

Defendant.

Case No. 2:19-CR-00321-APG-VCF

**Stipulation To Continue Supervised
Release Revocation Hearing**
(Eighth Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defendant and Aden Kebede, Assistant Federal Public Defender, counsel for MIKAELA MARIE CUEVAS, (“defendant”), that the supervised release revocation hearing in the abovementioned case, which is currently scheduled for May 3, 2023, at 10:00 a.m., be continued and reset to a date and time convenient to this Court, but not sooner than the scheduled May 24th sentencing hearing at 10:00 am in case number 2:22-cr-00286-CDS-BNW, for the following reasons:

1 1. On or about August 11, 2021, defendant made her initial appearance on a
2 petition for revocation of supervised release. ECF 13. She was released on bond and
3 remains at liberty pending a revocation hearing, which is currently scheduled for May 3,
4 2023.

5 2. On February 23, 2023, defendant was charged by way of an Information
6 upon a Waiver of Indictment, in case number 2:22-cr-00286-CDS-BNW, with one count
7 of Wire Fraud in violation of 18 U.S.C. §1343. ECF 7 and 10. That same day, pursuant
8 to a written plea agreement, Cueva pled guilty to the one count Information charging her
9 with Wire Fraud in violation of 18 U.S.C. §1343. ECF 9 and 10. Sentencing is currently
10 scheduled for May 24, 2023, at 10:00 am.

11 3. The parties have agreed that the revocation hearing should be held after the
12 defendant is sentenced in the new Wire Fraud case.

13 4. Additionally, government counsel is out of the district the first week of
14 May and would request a continuance of the May 3rd revocation hearing so that the
15 government may have continuity of counsel at this hearing.

16 5. The defendant is not incarcerated and does not object to the continuance.

17 6. The parties agree to the continuance and ask that the revocation hearing be
18 continued and reset to a date and time convenient to this Court, but not sooner than the
19 scheduled May 24th sentencing hearing at 10:00 am in case number 2:22-cr-00286-CDS-
20 BNW.

21 7. The additional time requested herein is not sought for purposes of delay,
22 but merely to allow the government continuity of counsel and the parties sufficient time
23 within which adequately prepare for the revocation hearing. Additionally, denial of this
24 request for continuance could result in a miscarriage of justice, and the ends of justice

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1 served by granting this request, outweigh the best interest of the public and the defendant
2 in a speedy hearing.

3 8. This is the eighth stipulation to continue the hearing.

4 DATED this 19th day of April, 2023.

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6 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

7 */s/ Aden Kebede*

/s/ Kimberly M. Frayn

8 By _____
9 ADEN KEBEDE
Assistant Federal Public Defender

By _____
KIMBERLY M. FRAYN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4
5 Plaintiff,
6 v.
7 MIKAELA MARIE CUEVAS,
8 Defendant.

Case No. 2:19-CR-00321-APG-VCF

**Findings of Fact, Conclusions of Law
and Order**

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10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore,
12 the Court finds that:

13 1. On or about August 11, 2021, defendant made her initial appearance on a
14 petition for revocation of supervised release. ECF 13. She was released on bond and
15 remains at liberty pending a revocation hearing, which is currently scheduled for May 3,
16 2023.

17 2. On February 23, 2023, defendant was charged by way of an Information
18 upon a Waiver of Indictment, in case number 2:22-cr-00286-CDS-BNW, with one count
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24 defendant is sentenced in the new Wire Fraud case.
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2 May and would request a continuance of the May 3rd revocation hearing so that the
3 government may have continuity of counsel at this hearing.

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7 scheduled May 24th sentencing hearing at 10:00 am in case number 2:22-cr-00286-CDS-
8 BNW.

9 7. The additional time requested herein is not sought for purposes of delay,
10 but merely to allow the government continuity of counsel and the parties sufficient time
11 within which adequately prepare for the revocation hearing. Additionally, denial of this
12 request for continuance could result in a miscarriage of justice, and the ends of justice
13 served by granting this request, outweigh the best interest of the public and the defendant
14 in a speedy hearing.

15 8. This is the eighth stipulation to continue the hearing.

16 **ORDER**

17 THEREFORE, IT IS HEREBY ORDERED that the revocation hearing in the
18 above-captioned matters, currently scheduled for May 3, 2023, at 10:00 a.m., be vacated
19 and continued to a date and time convenient to this Court, that is on May 24, 2023, at
20 the hour of 3:30 p.m. in Courtroom 6C.

21 DATED this 24th day of April 2023.

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25 HONORABLE ANDREW P. GORDON
26 United States District Court Judge